

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:) Case No: 15-33997
Jabbar Goodson)
Debtor) Chapter: Chapter 13
)
) Judge: LaShonda A. Hunt

NOTICE OF MOTION

To: Jabbar Goodson, 4042 216th St. Apt 1E, Matteson, IL, 60443

Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL, 60604

Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

PLEASE TAKE NOTICE that on **June 17, 2019 at 9:30 a.m.** I shall appear before the Honorable Judge **LaShonda A. Hunt** at 219 S. Dearborn St. # 719, Chicago IL 60604 and then and there present the attached **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached hereto.

By: /s/ Dale Riley
Dale Riley

CERTIFICATE OF SERVICE

I, Dale Riley, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 5/23/2019.

By: /s/Dale Riley
Dale Riley

Attorneys for the Debtor

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960

Central Park Apartments	Village of Matteson Bankruptcy Department 4900 Village Commons Matteson IL 60443
12304 Baltimore Ave Ste E Beltsville MD 20705	
Fair Collections & Outsourcing Bankruptcy Dept. 12304 Baltimore Ave., Ste. E Beltsville MD 20705	Municipal Coll. of America Bankruptcy Dept. 3348 Ridge Rd. Lansing IL 60438
City of Chicago Bureau Parking Department of Revenue PO Box 88292 Chicago IL 60680	Linebarger Goggan Blair & Bankruptcy Dept. PO Box 06152 Chicago IL 60606-0152
Arnold Scott Harris PC Bankruptcy Dept. 111 W. Jackson Blvd., Ste. 600 Chicago IL 60604	Village of Park Forest Attn: Bankruptcy Dept. 350 Victory Dr. Park Forest IL 60466
Secretary of State Bankruptcy Dept. 2701 S. Dirksen Pkwy. Springfield IL 62723	Municipal Coll. of America Bankruptcy Dept. 3348 Ridge Rd. Lansing IL 60438
DEPT OF EDUCATION/NELN Attn: Bankruptcy Dept. 121 S 13Th St Lincoln NE 68508	Village of Richton Park Attn: Bankruptcy Dept. 4455 Sauk Trail Richton Park IL 60471
IDES Bankruptcy Department 33 S. State Street 8th Floor Chicago IL 60603	
Andrew Dryjanksi Assistant Attorney General 33 S State St #992 Chicago IL 60603	
Illinois State Toll Hwy Auth Attn: Legal Dept - Bob Lane 2700 Ogden Ave. Downers Grove IL 60515-1703	
Linebarger Goggan Blair & Bankruptcy Dept. PO Box 06152 Chicago IL 60606-0152	
IRS Priority Debt Bankruptcy Dept. PO Box 7346 Philadelphia PA 19101	
Springleaf Financial S Attn: Bankruptcy Dept. 9632 S Cicero Ave Oak Lawn IL 60453	

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:) **Case No:** **15-33997**
 Jabbar Goodson)
 Debtor) **Chapter:** **Chapter 13**
)
) **Judge:** **LaShonda A. Hunt**

MOTION TO MODIFY CONFIRMED PLAN

NOW COMES the Debtor, Mr. Jabbar Goodson (the "Debtor"), by and through his attorneys, Geraci Law L.L.C., to present his **MOTION TO MODIFY CONFIRMED PLAN**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b)(2).
2. The Debtor filed his Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 10/06/2015.
3. The Debtor's plan was confirmed by the Court on 02/03/2016.
4. The Debtor fell behind on his Chapter 13 plan payments because he was off work to care for his mother who was ill.
5. The Debtor has returned to work and is able to resume plan payments, however he is unable to cure the default.
6. For the reasons stated above, it is necessary for the successful completion of the Debtor's plan to defer the arrears to the end of the plan term.

Court enter an order:

1. Deferring arrears to the end of the plan term,
2. Any other relief the court deems proper.

By: /s/ Dale Riley
Dale Riley

Attorneys for the Debtor

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960